



# NATIONAL ASSOCIATION OF THE DEAF

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October 8, 1996

**OCT - 8 1996**

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

DOCKET FILE COPY ORIGINAL

Re: In the Matter of Non-emergency Telephone Number  
for Police Services, CC Dkt. 92-105

Dear Mr. Caton:

Enclosed please find an original and four copies of the comments in the above captioned proceeding submitted by the National Association of the Deaf.

I would appreciate your referring all correspondence regarding this matter to my attention.

Sincerely,

Karen Peltz Strauss  
Legal Counsel for Telecommunications Policy

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Non-emergency Telephone Number ) CC Docket No. 92-105  
for Police Services )

**COMMENTS OF  
THE NATIONAL ASSOCIATION OF THE DEAF**

The National Association of the Deaf ("NAD") is pleased to have the opportunity to submit comments in response to the request of the United States Department of Justice that an N11 code, specifically 311, be reserved on a national basis for use by communities for non-emergency police telephone calls.

The NAD is the nation's largest organization safeguarding the accessibility and civil rights of 28 million deaf and hard of hearing Americans in education, employment, health care, and telecommunications. The NAD is a private, non-profit federation of 51 state association affiliates including the District of Columbia, organizational affiliates, and direct members. The NAD seeks to assure a comprehensive, coordinated system of services that is accessible to Americans who are deaf and hard of hearing, enabling them to achieve their maximum potential through increased independence, productivity, and integration.

**I. Introduction**

Individuals who are deaf and hard of hearing have had a long-standing interest in the FCC's N11 Docket. In this regard, consumers, through the National Center for Law and Deafness, submitted reply comments in this docket in July of 1992, and an emergency petition for

rulemaking regarding N11 codes in October of 1993. In both of those documents, consumers requested that the FCC allocate one or two N11 codes for access to nationwide telecommunications relay services. Additionally, in August of 1994, the NAD was one of four organizations representing the interests of individuals who are deaf and hard of hearing which responded to a request by the National Association of State Telecommunications Directors to assign an N11 code for access to state governments and a request by the United States General Services Administration to assign an N11 number for public access to federal executive agencies.

In all of the above documents, we noted the importance of allocating N11 codes for the important public purposes for which they were originally reserved. Similarly, we consistently have supported the principle that nationally ubiquitous uses of N11 codes which are in the public interest should be given priority over local uses which are commercially founded.

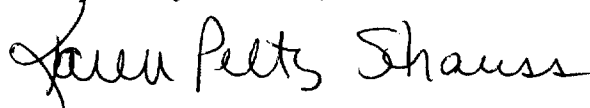
We take this opportunity to re-state our interest in seeing N11 codes used for public service applications, and renew our request to allocate one or two numbers for telecommunications relay services. Because of their scarcity, the FCC should act quickly to ensure that these codes are utilized in a fashion that benefits the nation as a whole. The request for allocation of a 311 code by the Department of Justice seems to strive toward this goal as well, noting the importance of developing a national community policing number for non-emergency calls that "will be as easy to use and remember as 911." While, at present, we take no position on the allocation of the 311 code, we do urge the Commission to condition any grant of the 311 code for non-emergency police telephone access on the code being fully and directly accessible to TTY users. Fulfillment of the goal of easy and widespread access to non-emergency services can only be achieved if this access is truly ubiquitous. Indeed, this would be consistent with Congressional intent, as mandated in Section 255 of the Telecommunications Act of 1996, to

ensure access to all telecommunications services for individuals with disabilities. Moreover, just as the Department of Justice has mandated direct TTY access to 911 emergency telephone services (rather than indirect access through telecommunications relay services), and the Commission is undertaking to ensure direct access by TTY users to enhanced 911 systems via wireless telecommunications services, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Dkt. No. 94-102, RM-8143, so too, should the Commission ensure in this proceeding that the needs of TTY users are met through direct access to non-emergency police services via the 311 code.

#### V. Conclusion

Title II of the Americans with Disabilities Act requires that individuals with hearing disabilities have the same access to 911 emergency systems that is enjoyed by the rest of the public. Similarly, the FCC should ensure that individuals with disabilities will be able to benefit from use of 311 non-emergency services if the Commission chooses to allocate the 311 code for this purpose. We thank the Commission for the opportunity to submit these views.

Respectfully submitted,



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